

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 V.) Criminal No. 00-177
)
FREDERICK JOHNSON)

**MOTION TO CONTINUE TIME
TO FILE SUPPLEMENTAL MOTION OR BRIEF**

AND NOW, comes the defendant, Frederick Johnson, by his attorney, Jay J. Finkelstein, Assistant Federal Public Defender, and respectfully files this Motion to Continue Time to File Supplemental Motion or Brief. In support thereof counsel states:

1. On May 30, 2008, Mr. Johnson filed a pro se motion for reduction of sentence pursuant to Title 18, U.S.C. §3582(c)(2).
2. On June 12, 2008, the government filed a Response in Opposition to the motion for reduction of sentence.

3. A day later, on June 13, 2008, the Court denied Mr. Johnson's motion.

4. On June 17, 2008, this Honorable Court granted Mr. Johnson's Motion for Reconsideration of the Court's Order Denying his Motion for Reduction of Sentence allowing undersigned counsel until July 31, 2008 to file a supplemental motion or brief.

5. Undersigned counsel requests additional time to continue researching the developing law and facts of Mr. Johnson's case and to continue to communicate with Mr. Johnson. Accordingly, counsel requests an additional 30 days within which to file the supplemental motion or brief.

WHEREFORE, for the foregoing reason, Frederick Johnson, respectfully asks this Honorable Court to grant undersigned counsel an additional 30 days within which to file the supplemental motion or brief.

Respectfully submitted,

s\ Jay J. Finkelstein

Jay J. Finkelstein
Assistant Federal Public Defender
Attorney ID No. 42943